

Message

From: Gerhard, Sasha [Gerhard.Sasha@epa.gov]
Sent: 9/7/2017 6:04:40 PM
To: Crosby-Vega, Terri [Crosby-Vega.Terri@epa.gov]
Subject: Re: Agenda-Subpart X Call (Sept. 7) - 12pm to 1:30pm EST

Hi Terri,

Yeah, busy day! I don't see any reason not to send out to the group.

Sasha

From: Crosby-Vega, Terri
Sent: Thursday, September 7, 2017 1:36:21 PM
To: Gerhard, Sasha
Subject: RE: Agenda-Subpart X Call (Sept. 7) - 12pm to 1:30pm EST

Notes from the call below...is it ok to send out to the Subpart X group? Busy call...I have another call in a few minutes.
Call-in information

- **Date/time:** Thursday, September 7; 12:00 to 1:30 EST
- **Call-in #:**
- **Code:**

Conference Line/Code / Ex. 6

Agenda

R1, R2, NJ, NY, PA, VA, R4, FL, KY, TN, WI, OH, R6, LA, OK, KS, MO, R8, ND, R9, CA, R10,

- **Headquarters' Update**-National Academy of Science (NAS), Meeting with Department of Defense Explosive Safety Board (DDESB), Radford Drone Air Sampling Report, Other

NAS Meeting-Planning to have draft report by February. Report is due to Congress in May or June 2018. October and December meeting scheduled. Locations are still undetermined. NAS requested permitting process information and alternative technologies information. Most of the small munitions can be treated in alternate technologies. NAS developing a list of what is inhibiting the use of technologies. Numerous presentations from DOD on waste streams. Focus should be on demil as Congress asked. Contamination discussion was part of the EPA presentation. EPA's presentation outlined the permitting process being a Subpart X unit. It is difficult to determine specific conditions and standards in permitting OB/OD units. A lot of uncertainty in permitting OB/OD units. There are similar permit conditions for in State permits. Presented slides for soil and groundwater contamination highest results. EPA stated that open burning was not separated from open detonation. EPA has not been able to determine contamination from historical operations versus current operating practices. EPA also unable to verify the contamination is attributed to OB/OD operations vs. previous practices on the same property. EPA did not attempt to determine all possible sources of the contamination. Need

assistance from States to sort out sources of contamination. Quantities of waste amount was questioned. EPA needs to confirm the total tonnage with the biennial report used. EPA serves as an advisor providing collected information. EPA provided a list of alternatives that have been identified and reports from other countries will be forwarded to NAS.

Contractor Efforts- 3 Tasks- Alternate Technologies, Contamination, Clean Closure Facilities- EPA will have a comprehensive report for alternative technologies. The contamination task has been more difficult than previously expected, and a report may not be complete. The Clean Closure task is just starting and will work off of the 2017 Intern project. The contamination task will continue as part of the closure task.

DDESB- Setting up a meeting at the end of September. Meeting to develop a path forward working together. High-level kick-off meeting with everyone.

Sea Disposal- Another incident regarding clamming bringing up mustard gas containers. One of the crew was sent to the hospital. A number of people are interested in this situation. Navy EOD responded to this situation.

Radford Drone Report- A research and development effort, but may not be as comprehensive for RCRA permitting use. HQ will be commenting and outlining concerns with the report.

- **Headquarters-Sasha Gerhard-** Renewal Terms for OB/OD Permits
We have learned that many OB/OD permits are being renewed on a 5-year cycle versus the traditional 10-year cycle. We are interested in hearing how many states are renewing on a 5-year cycle.
Can states who are renewing on a 5-year cycle please respond via the call or by email to Sasha (if you do not plan to attend the call) and let us know: 1) if the 5-year cycle only applies to OB/OD permits (and land disposal); and 2) whether it is state policy or state regs. that require this shorter cycle?

Permit Terms- EPA is interested in determining number of years the permit is used. NJ-10 years, RI- most states issue permits for 5 years, NY- not sure if any are under permit, PN- 10 years, VA- 10 years, FL- 5 year, TN-10 year, OH- 10 year, LA- 10 year, OK- 10 years, NM- 10 years, KS-10 years with Air giving a 5-year term exemption for Air regulations, CA- 10 years

- **NJDEP-John Scott-** Management of Flares and Flare Guns at Permitted TSDFs
Permitting and storage of flares- fire department requires to be put in magazines, flares mostly perchlorate, flares would be similar to management with the Fireworks Memo, consumers may be using for boating or roadside would be considered household hazardous waste.

- **NJDEP-John Scott-** Permitting of Walk-in Magazines for Storage

Walk-in Magazines—built illegally at a TSD. NJ is going to call it a container hazardous waste storage area. Commercial storage to handle munitions and fireworks. VA has a storage area prepared for rocket motors and treats it as a container storage area.

Ken Shuster—Delay of Closure for OB/OD—applies to landfills, surface impoundments but does not specifically reference OB/OD. However, criteria was established for OB/OD with the concept the same in guidance by doing activities under the Military Munitions Rule. Still required to perform closure. RCRA Info has OB/OD units classified as delay of closure. Recommended contacting States where the units are located.

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